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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BRUCE GILLEY,

Plaintiff,

v.

TOVA STABIN, Communications Manager,
University of Oregon Division of Equity and
Inclusion, in her official and individual
capacities,

Defendant.

Case No. 3:22-cv-01181-HZ

**DECLARATION OF LESLI
LARSON IN SUPPORT OF
DEFENDANT'S RULE 12(B)(1)
MOTION TO DISMISS**

I, Lesli Larson, state as follows:

1. I am over the age of 18 years old and state that the statements set forth in this declaration are true and correct and are based upon my personal knowledge. If called as a witness, I could and would testify to the statements contained in this declaration.

2. I am the Director of Content Strategy in the Communications Department at the University of Oregon (the "University").

1- **DECLARATION OF LESLI LARSON IN SUPPORT
OF DEFENDANT'S RULE 12(B)(1) MOTION TO
DISMISS**

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3. The University maintains internal social media guidelines, which can be viewed on the University's website at the following URL: <https://communications.uoregon.edu/social-media-guidelines>. A true and correct copy of the University's social media guidelines are attached hereto as Exhibit 1.

4. Under the University's social media guidelines, employees are prohibited from "delet[ing] comments or block[ing] users because they are critical or because [employees] disagree with the sentiment or viewpoint." The guidelines also state that, "[a]s a public university that values freedom of speech and a robust exchange of ideas, [employees] should err on the side of letting people have their say when commenting on our social media properties."

5. Under the University's social media guidelines, an employee may hide material created by a user or restrict access for a user only if the user engages in the following conduct:

- Post violent, obscene, profane, hateful or racist comments or otherwise uses offensive or inappropriate language
- Threaten or defame
- Post comments that are out of context, off topic or not relevant to the topic at hand
- Disclose personally identifiable information, such as addresses or phone numbers
- Include copyrighted materials
- Fall under the category of spam
- Suggest or encourage illegal activity
- Solicit, advertise or endorse a third-party business or service
- Are multiple successive posts by a single user
- Are disruptively repetitive posts copied and pasted by multiple users

6. The University's social media guidelines, as described above and attached hereto as Exhibit 1, have not changed since the present controversy with Plaintiff arose on June 14, 2022.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: September 7, 2022.

By: s/ Lesli Larson
Lesli Larson

3- DECLARATION OF LESLI LARSON IN SUPPORT
OF DEFENDANT'S RULE 12(B)(1) MOTION TO
DISMISS